

## REMARKS

Claims 11-20 are pending in the present application. Claims 11 and 18 have been amended in this response. Claim 17 has been cancelled, without prejudice. Support for the present amendment can be found, for example, in the specification on page 5, lines 15+.

Claims 11-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Mehrotra* (US Patent 6,115,717) in view of *Swanson et al.* (US Patent 5,987,459). Applicant traverses the rejection. Favorable reconsideration is respectfully requested.

Specifically, the cited art, alone or in combination does not teach “determining an image scene of said image sequence via MPEG intra-image, wherein the intra-image initiates the image scene; determining said search features for an image scene of said image sequence; prefixing the search features for an image scene to said intra-image; and storing said prefixes as an accessible list.” as recited in claim 11. Under the claimed configuration, several search features of an image scene of the image sequence is stored. Furthermore, search features of an image scene are stored as prefixes to an intra-image that initiates the image scene. This means that the search features are stored as a prefix to the respective image that is coded in an intra-mode and the intra-image that initiates the image scene is selected. Neither *Mehrotra* nor *Swanson* disclose these features.

In light of the above, Applicant respectfully submits that independent claim 11 of the present application, as well as claims 12-20 which respectfully depend therefrom, are both novel and non-obvious over the art of record. Accordingly, Applicant respectfully requests that a timely Notice of Allowance be issued in this case. If any additional fees are due in connection with this Application as a whole, the office is hereby authorized to deduct said fees from deposit account number 02-1818. If such a deduction is made, please indicate the Attorney Docket No. (0112740-408) on the account statement.

Respectfully submitted,

BELL, BOYD & LLOYD LLC

BY \_\_\_\_\_

Peter Zura

Reg. No. 48,196

Customer No.: 29177

Phone: (312) 807-4208

Dated: October 27, 2005